

Subject	Mold Procedures
Section	Occupational Safety
Effective Date	November 17, 2017
Purpose	The purpose of this policy is to outline the steps involved in following the mold regulations as established by Texas Department of Licensing & Regulations (TDLR)
Applicability	University of Houston

OVERVIEW

The purpose of policy is to identify the steps in following the mold regulations as it pertains to University of Houston and standardize the procedures within Environmental Health Life Safety (EHLS) to maximize efficiency. This procedure will be amended as required to be consistent with operational changes within EHLS and the (TDLR) and Texas Department of State Health Services (DSHS).

A. DEFINITIONS

Mold

Mold is defined as any living or dead fungi or related products or parts, including spores, hyphae, and mycotoxins. Mold spores occur naturally and are ubiquitous in the environment. When spores are inhaled or ingested, they can cause irritation or allergic reactions to the human respiratory system. Penicilium spores are the most commonly used type of mold spores that help in alleviating the symptoms of respiratory discomfort.

Mold Regulatory Background

The Texas Department of Licensing and Regulations recognizes mold spores as a public health concern and regulates them under the Mold Standard promulgated by TDLR. These rules require building owners to remove mold growth build-up on interior building spaces prior to any major health concerns arise or demolition and renovation activities. The TDLR rules and regulations contains emission control provisions which state there should be no visible emissions and the waste materials generated from a mold removal process should be adequately wet during the removal projects. It also states that mold spore waste along with the substrate, whenever possible, be placed in a sealed container and disposed of at regulated landfill site. The TDLR has been given regulatory authority by the State Legislature to enforce the rules of mold spore waste in Texas.

Texas Mold Assessment and Remediation Rules.

The TMARR rules can be found in the TDLR website. The rules apply to public and commercial building owners which have mold. The University must meet these requirements. Under the TDLR rules, a public building owner such as the University is

required to remove the mold whenever identified and encountered. Also public building owners such as the University, are required to inform all persons in writing (or documented oral communication) of the presence and location of mold buildup inside the buildings prior to the start of any mold related abatement activity.

B. POLICY

University of Houston has a strong commitment to achieving our mission while protecting our most valuable resource -- our employees, our students and our faculty. Work procedures and work practices relating to mold should be followed per the TDLR regulations to promote the comfort, safety, and health of the campus community.

C. PROCEDURES

a. Assessment

Information is received by EHLS of a mold concern then a thorough visual observation of the area is conducted. EHLS makes a preliminary determination whether the suspect area is mold or something else such as dust or dirt. Then if it is mold, the next step is to identify the square footage of the mold area. This step is necessary because if the visual mold is less than 25 contiguous square feet, then the mold can be cleaned / removed by University personnel.

If the mold area is larger than 25 square feet then EHLS requests that Facilities assign a project manager project. EHLS or Facilities then starts the process of getting the mold removed from inside the building.

Sampling the mold to identify the type can be done at the building occupants concern and expense; however it is really not necessary. The mold abatement process includes final clearance sampling to verify the mold was removed.

b. Mold abatement

1. Notification to DSHS prior to Mold Activity

If the mold area is larger than 25 contiguous square feet than a notification to the DSHS is required. The DSHS requires notification of ten working days prior to the planned mold removal activities. DSHS has a standard notification form that has to be filled out and mailed to Austin.

The TDLR rules require a license for all persons involved in the mold project. Each mold removal project is led by a licensed consultant or project manager. The actual mold removal work itself is carried out by a licensed mold removal contractor. There are multiple levels of licensure for the removal contractor

employees such as worker and supervisor. There are also medical monitoring requirements and examinations associated with the different levels of licensure. Currently, EHLS and FM have no licensed mold personnel.

The notification can be submitted to the DSHS by either the mold consultant or the mold contractor.

The DSHS has the responsibility of enforcing the mold regulations of TDLR by conducting unannounced inspections at mold abatement sites.

2. Removal of mold

The TDLR mold rules (TMARR) are comprehensive for public building owners and require licensed personnel for mold removal.

It is University's policy that the Asbestos and Safety Coordinator visually check in on the projects while the mold removal activities are going on, periodically.

3. Recordkeeping

Once the removal activities are completed records must be kept for 3 years.

4. Fee payment

Upon receipt of the 10 day advance notification to DSHS, a fee amount is generated. These invoices are generally sent out due within 60 days. Failure to pay an invoice is considered a violation and there may be additional fees added.